

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

**UNITED STATES OF AMERICA**

**v.**

**ENRIQUE ROBERTO “HENRY”  
CUELLAR and IMELDA RIOS  
CUELLAR,**

**Defendants.**

§  
§  
§  
§  
§  
§  
§  
§

**No. 4:24-cr-224**

**GOVERNMENT’S UNOPPOSED MOTION TO DISCLOSE GRAND JURY  
MATERIALS**

On May 9, 2024, Defendant Enrique “Henry” Cuellar filed a motion to dismiss the Indictment based on the Speech or Debate Clause of the United States Constitution. *See* ECF No. 87. In his motion, Defendant Cuellar asked the Court to order the government to disclose the transcript of the indictment proceedings before the grand jury, which neither defendant had previously requested. *Id.* at 1, 16. Pursuant to Federal Rule of Criminal Procedure 6(e), the government may not disclose proceedings before the grand jury without authorization. Accordingly, pursuant to Rule 6(e)(3)(E), the government respectfully requests that the Court authorize it to disclose to defense counsel of record the transcripts of witness testimony and associated exhibits related to this matter, subject to the Protective Order, ECF No. 40.

Dated: May 15, 2025

Respectfully submitted,

EDWARD P. SULLIVAN  
Acting Chief  
Public Integrity Section  
Criminal Division  
U.S. Department of Justice

JENNIFER KENNEDY GELLIE  
Chief  
Counterintelligence and Export Control Section  
National Security Division  
U.S. Department of Justice

By: /s/ Celia Choy  
Rosaleen O’Gara  
Celia Choy  
Aaron L. Jennen  
Attorneys for the United States

By: /s/ Garrett Coyle  
Garrett Coyle  
Attorney for the United States

**CERTIFICATE OF CONFERENCE**

I certify that on May 14, 2025, I conferred with counsel for defendants Henry Cuellar and Imelda Cuellar regarding this motion, and they advised that neither defendant objects to this motion.

/s/ Celia Choy  
Celia Choy

**CERTIFICATE OF SERVICE**

I certify that I filed this motion via the CM/ECF system on May 15, 2025, which caused the motion to be electronically served on all counsel of record.

/s/ Celia Choy  
Celia Choy